

**BUNKER
LIMITED**

PARTNERSHIP

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December 1, 1994

Mr. Sean Sheldrake, Project Manager
Superfund Branch
U.S. ENVIRONMENTAL PROTECTION AGENCY
1200 Sixth Avenue, HW-113
Seattle, WA 98101

Re: Steam Line Removal Work Plan

Dear Sean:

Bunker Limited Partnership responds to your comments of November 28, 1994 regarding BLP's Remedial Action Management Plan for the removal of asbestos covered pipe as follows:

Comment 2.2, Organizational Structure: See Attached.

Comment 2.3.2, Project Superintendent/Engineer: The Contractor will dedicate at least one supervisor to each job site.

Comment 2.4.1, Subcontracts: The proposed contractor is Wilder Environmental. Wilder's major subcontractor for this project is MCS Environmental. Additional subcontractors will include, but not be limited to CJB Environmental, Stewart Contracting, D.G.&S. Construction, and MACS Laboratories.

Comment 3.3, Training: The training provided will be in compliance with 40 CFR, Section 61 subpart M, and EPA NESHAP's for the ultimate project design.

Comment 4.2.2.1, Task: The Contractor will provide an 8 to 12-inch cover of clean fill over the principal threat material (PTM) for construction of the access road near Deadwood Gulch at Crosby Point. If the clean fill cover does not withstand vehicle traffic, as determined by the Project Superintendent and on-scene representative, then a portable wheel wash vehicle decontamination station will be constructed.

Comment 4.2.3, Disposal Site Preparation: The Contractor will utilize the West Canyon Asbestos Laydown Area until full, and then prepare and utilize an alternative area as designated by the Agency.

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Comment 4.3.2, Health and Safety Facilities: Pintlar Corporation is winterizing the McKinley Avenue decontamination station. If not completed prior to commencement of this work, the Contractor will utilize a pressure washer at the decontamination station which will be connected to a hot water line inside the decontamination facility (dry).

Comment 4.4.3.1, Task: The Contractor will wrap the pipe with plastic and candystripe with duct tape prior to glove bagging as suggested for the buried section of pipe. This method will prevent visible emissions during the cutting process. The plastic wrapping and the enclosed pipe insulation will be handled carefully to prevent additional damage. The Contractor will work with all oversight personnel to develop alternate abatement methods, if necessary.

Comment 6.5, Action Levels and Responses: The action level for asbestos fibers will be changed to 0.10 fibers/cc. The action levels for arsenic, lead, and cadmium are 5ug/m³, 30ug/m³, and 2.5ug/m³, respectively.

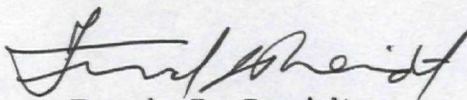
Comment 7.1, Non-Compliance: If any problems develop, the Contractor will notify EPA/IDHW immediately.

The Work Plan will be revised accordingly.

The proposed Contractor has reviewed the Work Plan, your comments and BLP's response. They are prepared to undertake the removal of asbestos covered pipe in accordance with BLP's Remedial Action Management Plan for this task as amended by this letter. Bunker Limited Partnership looks forward to your prompt approval so that this work may proceed. If you have any questions, please contact me.

Very truly yours,

BUNKER LIMITED PARTNERSHIP
by BH Properties, Inc., General Partner



Frank J. Breidt
Vice President

Enclosure

cc: Armina Nolan, EPA-ATD
Becky Goehring, EPA-ATD
Bill Hudson, CH2M Hill
Scott Peterson, IDHW

ATTACHMENT 1

